

COMMONWEALTH OF MASSACHUSETTS

Office of

District Attorney Joseph D. Early, Jr.

Worcester County  
(Middle District)  
(508)-755-8601

Worcester Trial Court  
225 Main St. G301 Worcester, MA 01608  
[www.worcesterda.com](http://www.worcesterda.com)



December 13, 2018

Todd Wallack  
Boston Globe  
Via email: [todd.wallack@globe.com](mailto:todd.wallack@globe.com)

Re: Public Record Request

Dear Mr. Wallack:

Please find the enclosed documents in response to your request made with the District Attorney's Office via email on November 30 for payments made to Cosgrove, Eisenberg & Kiley, P.C.

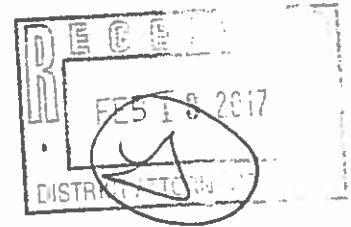
If you wish pursue this matter further, you may do so by contacting the Supervisor of Public Records.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Lindsay Corcoran", is written over a horizontal line.

Lindsay Corcoran  
Records Access Officer

Cosgrove, Eisenberg & Kiley, P.C.  
803 Hancock Street  
P.O. Box 189  
Quincy, MA 02170,  
(617) 479-7770



February 10, 2017

Timothy J. Cruz  
District Attorney  
District Attorney's Office  
166 Main Street  
Brockton, MA 02301

Joseph D. Early, Jr.  
District Attorney  
District Attorney's Office  
Courthouse, Room G301  
225 Main Street  
Worcester, MA 01608

Michael D. O'Keefe  
District Attorney  
District Attorney's Office  
3231 Main Street  
P.O. Box 455  
Barnstable, MA 01630

ATTN: *Jee*

RE: Maura Healey, Attorney General vs.  
TIMOTHY J. CRUZ, PLYMOUTH COUNTY  
DISTRICT ATTORNEY; JOSEPH D. EARLY, JR.,  
WORCESTER COUNTY DISTRICT ATTORNEY &  
MICHAEL D. O'KEEFE, CAPE & ISLAND  
DISTRICT ATTORNEY

CONTROL: 54279

OUR FILE: 14721.gov14721

OUR TAX ID:04-2599380

YOUR FILE NO:

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For Professional Services Rendered

		<u>Hrs/Rate</u>
11/25/2016 TRK	Document review; tc's.	0.33 330.00/hr
11/30/2016 TRK	Intake.	0.25 330.00/hr
CV	Conf/TK; rev. docs; locate and rev. complaint and SPR rulings; locate and rev. DA database legislation; rev. Globe v. DA of Middlesex (CORI); locate and rev.	2.75 330.00/hr

**APPROVED**

*11/2/17*

*to Submit  
4/12/17*

		<u>Hrs/Rate</u>
	press release and press treatment.	
12/4/2016 CV	Review complaint and exhibits; summarize DA objections and SPR rulings; assemble summary table of same.	3.00 330.00/hr
12/5/2016 CV	Conf/TK re: case, merits, strategy.	0.33 330.00/hr
12/13/2016 TRK	Document review; tc's/AGO and DA's offices.	1.75 330.00/hr
12/14/2016 TRK	Tc's and TTD.	0.33 330.00/hr
1/4/2017 TRK	Work on answers; tc's and correspondence; conference call; tc/AGO; tc/Secretary Public Safety; document review and TTD.	8.33 330.00/hr
1/6/2017 TRK	Tc's/Public Safety; Secretary of State; AGO; draft answer.Tc's and correspondence/AGO; edit answer; tc's and correspondence/clients, Association and CJIS.	10.00 330.00/hr
1/11/2017 TRK	TTD and edit/Secretary correspondence.	0.50 330.00/hr
CV	Rev. file materials; draft PRL request to SPR.	1.75 330.00/hr

		<u>Hrs/Rate</u>
1/18/2017 TRK	Prep; meeting at DCJIS; follow up.	2.50 330.00/hr
1/26/2017 TRK	Mechanics related to SAAG/work on answer; Update clients; tc/Supervisor; r/r response to Public Record Request.	4.00 330.00/hr
1/30/2017 TRK	Finish Public Records Review; drafting and editing answer.	3.50 330.00/hr

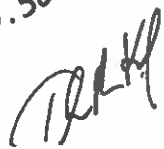
	<u></u>	<u>Amount</u>
Total Time	39.32	\$12,976.60

## Attorney Summary

Name	Hours	Rate	Amount
Carl Valvo	7.83	330.00	\$2,584.10
Thomas R. Kiley	31.49	330.00	\$10,392.50

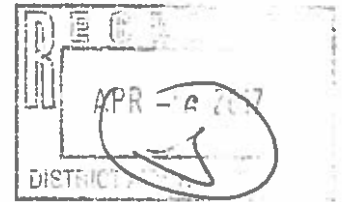
TOTAL AMOUNT DUE AT THIS TIME

~~\$12,976.60~~

Job :  
 One third comes out  
 to \$4,325.50.  


trk

Cosgrove, Eisenberg & Kiley, P.C.  
803 Hancock Street  
P.O. Box 189  
Quincy, MA 02170,  
(617) 479-7770



April 04, 2017

Timothy J. Cruz  
District Attorney  
District Attorney's Office  
166 Main Street  
Brockton, MA 02301

Joseph D. Early, Jr.  
District Attorney  
District Attorney's Office  
Courthouse, Room G301  
225 Main Street  
Worcester, MA 01608

Michael D. O'Keefe  
District Attorney  
District Attorney's Office  
3231 Main Street  
P.O. Box 455  
Barnstable, MA 01630

ATTN: *Joe*

RE: Maura Healey, Attorney General vs.  
TIMOTHY J. CRUZ, PLYMOUTH COUNTY  
DISTRICT ATTORNEY; JOSEPH D. EARLY, JR.,  
WORCESTER COUNTY DISTRICT ATTORNEY &  
MICHAEL D. O'KEEFE, CAPE & ISLAND  
DISTRICT ATTORNEY

CONTROL: 54586

OUR FILE: 14721.govl4721

OUR TAX ID: 04-2599380

YOUR FILE NO:

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For Professional Services Rendered

		<u>Hrs/Rate</u>
2/1/2017 TRK	Edit answer; SAAG mechanics; client correspondence.	2.00 330.00/hr
2/2/2017 TRK	Editing; correspondence.	1.50 330.00/hr
2/3/2017 TRK	Edit; file answer.	0.60 330.00/hr
2/6/2017 TRK	Monitor SJC case; Correspondence	2.50 330.00/hr

**APPROVED**

*Michael*

*[Signature]*  
4/12/17

*to submit*

		<u>Hrs/Rate</u>	
2/22/2017 TRK	Document review and telephone calls.	0.33 330.00/hr	
2/25/2017 TRK	File review and TTD - prep . for MDAA session.	0.75 330.00/hr	
3/1/2017 TRK	Tc's/client and Bolan; document review.	0.33 330.00/hr	NO CHARGE
3/6/2017 TRK	MDDA issues; Ethics compliance.	1.00 330.00/hr	
3/23/2017 TRK	Prep; TTD; review new CORI study; prep; meeting/DA's Association.	2.60 330.00/hr	
3/28/2017 TRK	Discussion of next steps with AAG; correspondence and document review, Discovery issues and TTD.	1.50 330.00/hr	
3/30/2017 CV	Conf/TK re: strategy, theory of case; rev. Attorney General proposed exhibits; memo to TK.	1.00 330.00/hr	

	<u>Amount</u>
Total Time	14.11 \$4,547.40

Attorney Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Carl Valvo	1.00	330.00	\$330.00
Thomas R. Kiley	12.78	330.00	\$4,217.40

## Additional charges:

	<u>Amount</u>
1/31/2017 Westlaw Report	33.09
Westlaw Report	363.94
 Total costs	 <u>\$397.03</u>
TOTAL DUE THIS PERIOD	<u>\$4,944.43</u>
PREVIOUS BALANCE	- \$12,976.60
 TOTAL AMOUNT DUE AT THIS TIME	 <u>\$17,921.03</u>

Joe:  
 Your share of  
 this month's + last month's true  
 work out to \$1,640.14. Prior  
 payments are in the works.  
 TRK

Cosgrove, Eisenberg & Kiley, P.C.  
803 Hancock Street  
P.O. Box 189  
Quincy, MA 02170,  
(617) 479-7770

7318

4/18/30



May 02, 2017

Timothy J. Cruz  
District Attorney  
District Attorney's Office  
166 Main Street  
Brockton, MA 02301

Joseph D. Early, Jr.  
District Attorney  
District Attorney's Office  
Courthouse, Room G301  
225 Main Street  
Worcester, MA 01608

Michael O'Keefe  
District Attorney  
District Attorney's Office  
3231 Main Street  
P.O. Box 455  
Barnstable, MA 01630

ATTN:

RE: Maura Healey, Attorney General vs.  
TIMOTHY J. CRUZ, PLYMOUTH COUNTY  
DISTRICT ATTORNEY; JOSEPH D. EARLY, JR.,  
WORCESTER COUNTY DISTRICT ATTORNEY &  
MICHAEL D. O'KEEFE, CAPE & ISLAND  
DISTRICT ATTORNEY

CONTROL: 54693

OUR FILE: 14721.govl4721

OUR TAX ID: 04-2599380

YOUR FILE NO:

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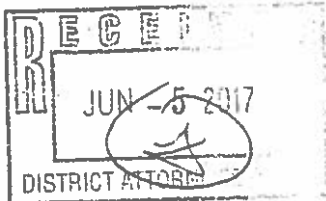
For Professional Services Rendered

		<u>Hrs/Rate</u>	<u>Amount</u>
4/10/2017 TRK	Document review; TTD; correspondence re: Agreed Facts; review case law; tc's with Mintz re: effect of Public Record Litigation on Tort Action; TTD re: history.	4.17 330.00/hr	1,376.10
4/21/2017 TRK	Tc's and correspondence re: AG representation (Cruz); telephone calls and correspondence/ legislative history; receipt and	3.67 330.00/hr	1,211.10

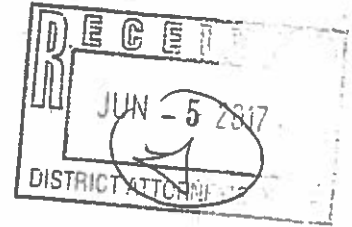


		<u>Hrs/Rate</u>	<u>Amount</u>
	review documents; r/r documents from Leg. Committee.		
4/25/2017 TRK	Worcester review; tc's and correspondence (Worcester and Committee).	2.90 330.00/hr	957.00
<hr/>			
Total Time		10.74	\$3,544.20
<hr/>			
Attorney Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Thomas R. Kiley	10.74	330.00	\$3,544.20
<hr/>			
PREVIOUS BALANCE			\$17,921.03
<hr/>			
PAYMENTS			
3/29/2017	Payment from Plymouth County DA		(\$4,325.50)
3/29/2017	Payment frm Islands DA. Check No. DIR DEP		(\$4,325.50)
4/18/2017	Payment - thank you - Cape and Island DA's Office. Check No. DirDep		(\$1,648.14)
4/27/2017	Payment -thank you. Check No. DIR DEP		(\$5,973.64)
<hr/>			
Total payments and adjustments			(\$16,272.78)
<hr/>			
TOTAL AMOUNT DUE AT THIS TIME			\$5,192.45
<hr/>			

Middle District's share  
is \$1,648.14 from previous  
balance and 1/3 of current  
fine charges (\$1,181.00) which  
adds to 2,829.34  
TH Kiley



Cosgrove, Eisenberg & Kiley, P.C.  
803 Hancock Street  
P.O. Box 189  
Quincy, MA 02170,  
(617) 479-7770



June 01, 2017

Timothy J. Cruz  
District Attorney  
District Attorney's Office  
166 Main Street  
Brockton, MA 02301

Joseph D. Early, Jr.  
District Attorney  
District Attorney's Office  
Courthouse, Room G301  
225 Main Street  
Worcester, MA 01608

Michael D. O'Keefe  
District Attorney  
District Attorney's Office  
3231 Main Street  
P.O. Box 455  
Barnstable, MA 01630

ATTN:

RE: Maura Healey, Attorney General vs.  
TIMOTHY J. CRUZ, PLYMOUTH COUNTY  
DISTRICT ATTORNEY; JOSEPH D. EARLY, JR.,  
WORCESTER COUNTY DISTRICT ATTORNEY &  
MICHAEL D. O'KEEFE, CAPE & ISLAND  
DISTRICT ATTORNEY

CONTROL: 54790

OUR FILE: 14721.govl4721

OUR TAX ID: 04-2599380

YOUR FILE NO:

APPROVED

*Midgel* *[Signature]* *for submit*

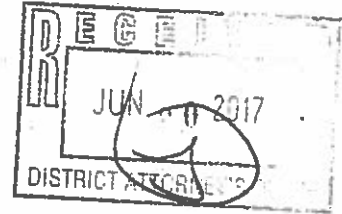
Additional charges:

	<u>Amount</u>
4/19/2017 Westlaw report	192.90
Total costs	\$192.90
PREVIOUS BALANCE	\$5,192.45
PAYMENTS	
5/18/2017 Payment - thank you. Check No. DIR DEP	(\$1,648.14)
Total payments and adjustments	(\$1,648.14)
TOTAL AMOUNT DUE AT THIS TIME	\$3,737.21

trk

Your share of the additional billing  
is \$64.30. Your prior share is already billed.  
*TRK*

Cosgrove, Eisenberg & Kiley, P.C.  
803 Hancock Street  
P.O. Box 189  
Quincy, MA 02170,  
(617) 479-7770



June 27, 2017

Timothy J. Cruz  
District Attorney  
District Attorney's Office  
166 Main Street  
Brockton, MA 02301

Joseph D. Early, Jr.  
District Attorney  
District Attorney's Office  
Courthouse, Room G301  
225 Main Street  
Worcester, MA 01608

Michael D. O'Keefe  
District Attorney  
District Attorney's Office  
3231 Main Street  
P.O. Box 455  
Barnstable, MA 01630

ATTN:

RE: Maura Healey, Attorney General vs.  
TIMOTHY J. CRUZ, PLYMOUTH COUNTY  
DISTRICT ATTORNEY; JOSEPH D. EARLY, JR.,  
WORCESTER COUNTY DISTRICT ATTORNEY &  
MICHAEL D. O'KEEFE, CAPE & ISLAND  
DISTRICT ATTORNEY

CONTROL: 54790

OUR FILE: 14721.gov14721

OUR TAX ID: 04-2599380

YOUR FILE NO:

**APPROVED**

*midael*  *to appear*

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For Professional Services Rendered

		<u>Hrs/Rate</u>	<u>Amount</u>
6/14/2017 TRK	Tc/client and TTD; response re: issues to be reported and legal research.	1.60 330.00/hr	528.00
6/22/2017 TRK	Tc's and correspondence.	0.33 330.00/hr	108.90
6/23/2017 TRK	Correspondence; tc's and conf. call.	0.83 330.00/hr	273.90
Total Time		2.76	\$910.80

Attorney Summary			
Name	Hours	Rate	Amount
Thomas R. Kiley	2.76	330.00	\$910.80

## Additional charges:

	Amount
5/31/2017 West Law Report	5.06
Total costs	\$5.06
TOTAL DUE THIS PERIOD	\$915.86
PREVIOUS BALANCE	\$3,737.21
PAYMENTS	
5/30/2017 Plymout	(\$1,181.40)
6/5/2017 Worcester	(\$1,181.40)
6/12/2017 Cape & Islands	(\$1,181.40)
6/20/2017 Payment - thank you. Check No. DIR DEP ISLAND	(\$166.80)
Total payments and adjustments	(\$3,711.00)
TOTAL AMOUNT DUE AT THIS TIME	\$942.07

Tim, Joe, Mike

Your share of the 915.86 is 305.29

*Tim*

Cosgrove, Eisenberg & Kiley, P.C.  
803 Hancock Street  
P.O. Box 189  
Quincy, MA 02170,  
(617) 479-7770

August 01, 2017

Timothy J. Cruz  
District Attorney  
District Attorney's Office  
166 Main Street  
Brockton, MA 02301

Joseph D. Early, Jr.  
District Attorney  
District Attorney's Office  
Courthouse, Room G301  
225 Main Street  
Worcester, MA 01608

Michael O'Keefe  
District Attorney  
District Attorney's Office  
3231 Main Street  
P.O. Box 455  
Barnstable, MA 01930

APPROVED

Michael *[Signature]* to Submit

ATTN:

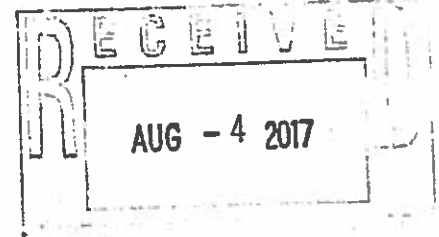
RE: Maura Healey, Attorney General vs.  
TIMOTHY J. CRUZ, PLYMOUTH COUNTY  
DISTRICT ATTORNEY; JOSEPH D. EARLY, JR.,  
WORCESTER COUNTY DISTRICT ATTORNEY &  
MICHAEL D. O'KEEFE, CAPE & ISLAND  
DISTRICT ATTORNEY

CONTROL: 55097

OUR FILE: 14721.gov14721

OUR TAX ID: 04-2599380

YOUR FILE NO:



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For Professional Services Rendered

	Hrs/Rate	Amount
7/17/2017 TRK AG Correspondence	0.75 330.00/hr	247.50
Total Time	0.75	\$247.50

Attorney Summary

Name	Hours	Rate	Amount
Thomas R. Kiley	0.75	330.00	\$247.50

PREVIOUS BALANCE

\$942.07

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Amount

## PAYMENTS

7/3/2017 Payment - thank you. Check No. 9571	(\$305.29)
7/10/2017 Payment - thank you. Check No. DIR DEP	(\$369.59) @
Total payments and adjustments	(\$674.88)
TOTAL AMOUNT DUE AT THIS TIME	\$514.69

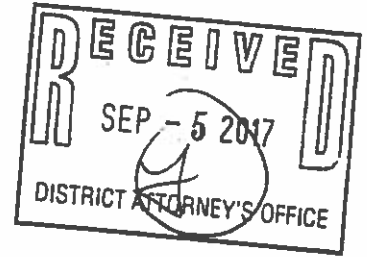
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The share each office  
has of the July time is \$82.50.

The difference between the previous balance  
and the payments is \$267.19. Some office  
owes that amount - yours Jim (but I think  
you owe Joe for overpaying)

Tim R. K.

Cosgrove, Eisenberg & Kiley, P.C.  
803 Hancock Street  
P.O. Box 189  
Quincy, MA 02170,  
(617) 479-7770



August 31, 2017

Timothy J. Cruz  
District Attorney  
District Attorney's Office  
166 Main Street  
Brockton, MA 02301

Joseph D. Early, Jr.  
District Attorney  
District Attorney's Office  
Courthouse, Room G301  
225 Main Street  
Worcester, MA 01608

Michael O'Keefe  
District Attorney  
District Attorney's Office  
3231 Main Street  
P.O. Box 455  
Barnstable, MA 01630

ATTN:

RE: Maura Healey, Attorney General vs.  
TIMOTHY J. CRUZ, PLYMOUTH COUNTY  
DISTRICT ATTORNEY; JOSEPH D. EARLY, JR.,  
WORCESTER COUNTY DISTRICT ATTORNEY &  
MICHAEL D. O'KEEFE, CAPE & ISLAND  
DISTRICT ATTORNEY

CONTROL: 55191

OUR FILE: 14721.gov14721

OUR TAX ID: 04-2599380

YOUR FILE NO:

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For Professional Services Rendered

		<u>Hrs/Rate</u>	<u>Amount</u>
8/15/2017 MF	Memo for AG v. DA on transfer to SJG.	4.83 330.00/hr	1,593.90
8/16/2017 MF	AG v. DA memo on transfer to SJG.	1.67 330.00/hr	551.10
8/17/2017 TRK	Tc's; document editing; TTD.	2.00 330.00/hr	660.00
MF	AG v. DA letter to opposing counsel.	1.83 330.00/hr	603.90

	<u>Hours</u>	<u>Amount</u>
Total Time	10.33	\$3,408.90

Attorney Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Meredith Fierro	8.33	330.00	\$2,748.90
Thomas R. Kiley	2.00	330.00	\$660.00

PREVIOUS BALANCE	\$514.69
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TOTAL AMOUNT DUE AT THIS TIME	\$3,923.59
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Adjustment for duplication

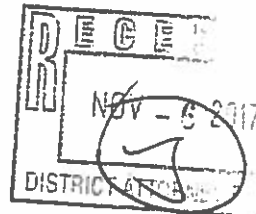
Each office owes \$900 for services (August) between August 1 and August 30.  
See last month's bill with respect to prior balance

Total due 3,214.69

*TH Kiley*



Cosgrove, Eisenberg & Kiley, P.C.  
803 Hancock Street  
P.O. Box 189  
Quincy, MA 02170,  
(617) 479-7770



November 01, 2017

Timothy J. Cruz  
District Attorney  
District Attorney's Office  
166 Main Street  
Brockton, MA 02301

Joseph D. Early, Jr.  
District Attorney  
District Attorney's Office  
Courthouse, Room G301  
225 Main Street  
Worcester, MA 01608

Michael D. O'Keefe  
District Attorney  
District Attorney's Office  
3231 Main Street  
P.O. Box 455  
Barnstable, MA 01630

ATTN:

RE: Maura Healey, Attorney General vs.  
TIMOTHY J. CRUZ, PLYMOUTH COUNTY  
DISTRICT ATTORNEY; JOSEPH D. EARLY, JR.,  
WORCESTER COUNTY DISTRICT ATTORNEY &  
MICHAEL D. O'KEEFE, CAPE & ISLAND  
DISTRICT ATTORNEY

CONTROL: 55487

OUR FILE: 14721.gov14721

OUR TAX ID: 04-2599380

YOUR FILE NO:

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For Professional Services Rendered

		<u>Hrs/Rate</u>	<u>Amount</u>
10/11/2017 TRK	Document review; TTD.	1.67 330.00/hr	551.10
10/12/2017 MF	Review file; editing statement of facts.	5.00 330.00/hr	1,650.00
10/13/2017 MF	Research for opposition memo.	7.83 330.00/hr	2,583.90
10/24/2017 TRK	Document review and edit; TTD.	0.75 330.00/hr	247.50
MF	Edits to statement of agreed facts.	2.00 330.00/hr	660.00

		<u>Hrs/Rate</u>	<u>Amount</u>
10/26/2017 TRK	TTD; document review.	1.00 330.00/hr	330.00
MF	Edits to statement of agreed facts.	0.83 330.00/hr	273.90
10/30/2017 MF	Edits to statement of facts; research and drafting opposition to summary judgment.	8.33 330.00/hr	2,748.90
10/31/2017 MF	Edits to statement of facts; correspondence; research for opposition motion.	2.50 330.00/hr	825.00

Total Time	29.91	<u>5,896.80</u> <del>\$9,870.30</del>
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Attorney Summary				
Name		Hours	Rate	Amount
Meredith Fierro	<del>TRK</del> <i>govt rate reduction.</i>	26.49	<del>100</del> 330.00	<del>\$8,741.70</del>
Thomas R. Kiley		3.42	330.00	\$1,128.60

PREVIOUS BALANCE	\$2,171.83
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## PAYMENTS

10/19/2017 Payment received from Main Street Islands District Attorney	(\$900.00)
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Total payments and adjustments	(\$900.00)
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TOTAL AMOUNT DUE AT THIS TIME	\$11,142.13
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*Govt Rate Reduction*

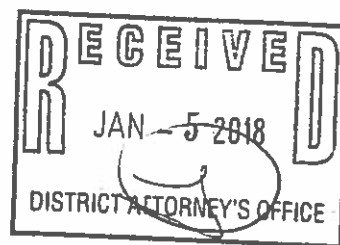
- 4,673.80  
\* 7,068.63

*Amount now due**TRK*

trk

Cosgrove, Eisenberg & Kiley, P.C.

803 Hancock Street  
P.O. Box 189  
Quincy, MA 02170,  
(617) 479-7770



January 03, 2018

Timothy J. Cruz  
District Attorney  
District Attorney's Office  
166 Main Street  
Brockton, MA 02301

Joseph D. Early, Jr.  
District Attorney  
District Attorney's Office  
Courthouse, Room G301  
225 Main Street  
Worcester, MA 01608

Michael D. O'Keefe  
District Attorney  
District Attorney's Office  
3231 Main Street  
P.O. Box 455  
Barnstable, MA 01630

ATTN:

RE: Maura Healey, Attorney General vs.  
TIMOTHY J. CRUZ, PLYMOUTH COUNTY  
DISTRICT ATTORNEY; JOSEPH D. EARLY, JR.,  
WORCESTER COUNTY DISTRICT ATTORNEY &  
MICHAEL D. O'KEEFE, CAPE & ISLAND  
DISTRICT ATTORNEY

CONTROL: 55798

OUR FILE: 14721.gov14721

OUR TAX ID: 04-2599380

YOUR FILE NO:

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For Professional Services Rendered

		<u>Hrs/Rate</u>	<u>Amount</u>
12/1/2017 MF	Edits to agreed facts, correspondence; summary judgment motion.	1.33 180.00/hr	239.40
12/6/2017 MF	Drafting summary judgment opposition.	2.00 180.00/hr	360.00
12/15/2017 MF	Drafting opposition on summary judgment.	2.00 180.00/hr	360.00
12/26/2017 TRK	Research Task Force recommendation and cases cited.	1.20 330.00/hr	396.00

		<u>Hrs/Rate</u>	<u>Amount</u>
12/27/2017 TRK	Document review and editing; TTD.	3.00 330.00/hr	990.00
MF	Read Commission report; notes to opposition draft.	3.50 180.00/hr	630.00
Total Time		13.03	\$2,975.40

## Attorney Summary

Name	Hours	Rate	Amount
Meredith Fierro	8.83	180.00	\$1,589.40
Thomas R. Kiley	4.20	330.00	\$1,386.00

## Additional charges:

11/30/2017 Westlaw Report	86.77
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Total costs	\$86.77
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TOTAL DUE THIS PERIOD	\$3,062.17
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PREVIOUS BALANCE	\$11,151.30
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## PAYMENTS

12/11/2017 Payment - thank you. Check No. Dir Dep	(\$2,356.21)
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Total payments and adjustments	(\$2,356.21)
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TOTAL AMOUNT DUE AT THIS TIME	\$11,857.26
-------------------------------	-------------

Each office owes \$1,020.72 for this period.

*TRK*

Cosgrove, Eisenberg & Kiley, P.C.  
803 Hancock Street  
P.O. Box 189  
Quincy, MA 02170,  
(617) 479-7770

December 04, 2017

Timothy J. Cruz  
District Attorney  
District Attorney's Office  
166 Main Street  
Brockton, MA 02301

Joseph D. Early, Jr.  
District Attorney  
District Attorney's Office  
Courthouse, Room G301  
225 Main Street  
Worcester, MA 01608

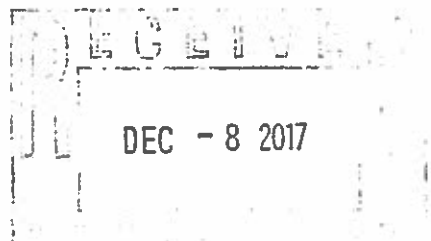
Michael D. O'Keefe  
District Attorney  
District Attorney's Office  
3231 Main Street  
P.O. Box 455  
Barnstable, MA 01630

ATTN:

RE: Maura Healey, Attorney General vs.  
TIMOTHY J. CRUZ, PLYMOUTH COUNTY  
DISTRICT ATTORNEY; JOSEPH D. EARLY, JR.,  
WORCESTER COUNTY DISTRICT ATTORNEY &  
MICHAEL D. O'KEEFE, CAPE & ISLAND  
DISTRICT ATTORNEY

CONTROL: 55604

OUR FILE: 14721.govl4721  
OUR TAX ID: 04-2599380  
YOUR FILE NO:



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For Professional Services Rendered

		<u>Hrs/Rate</u>	<u>Amount</u>
11/1/2017 MF	Correspondence.	0.08 180.00/hr	14.40
11/3/2017 MF	Opposition to summary judgment draft.	0.75 180.00/hr	135.00
11/6/2017 MF	Edits to statement of agreed facts, correspondence with DAs.	0.50 180.00/hr	90.00
11/9/2017 MF	Correspondence.	0.08 180.00/hr	14.40

		<u>Hrs/Rate</u>	<u>Amount</u>
11/10/2017 TRK	Document review; TTD.	1.40 330.00/hr	462.00
MF	Correspondence and work on statement of agreed facts.	0.25 180.00/hr	45.00
11/13/2017 MF	Research and draft opposition to motion for summary judgment.	5.58 180.00/hr	1,004.40
11/14/2017 MF	Draft opposition to motion for summary judgment.	7.92 180.00/hr	1,425.60
11/16/2017 MF	Further research for opposition motion.	0.67 180.00/hr	120.60
11/21/2017 MF	Reviewing agreed facts and correspondence.	0.42 180.00/hr	75.60
TRK	Document review; TTD.	0.83 330.00/hr	273.90
11/28/2017 MF	Correspondence and edits to agreed statement of facts.	1.00 180.00/hr	180.00
11/30/2017 MF	Drafting opposition to summary judgment motion.	1.00 180.00/hr	180.00
Total Time		20.48	\$4,020.90

## Attorney Summary

Name	Hours	Rate	Amount
Meredith Fierro	18.25	180.00	\$3,285.00
Thomas R. Kiley	2.23	330.00	\$735.90

## Additional charges:

10/31/2017 West Law Report

Amount

61.77

Total costs

\$61.77

TOTAL DUE THIS PERIOD

\$4,082.67

PREVIOUS BALANCE

\$11,142.13

## PAYMENTS

11/3/2017 ~~Court~~ <sup>Governor</sup> Rate Reduction(\$4,073.50)

Total payments and adjustments

(\$4,073.50)

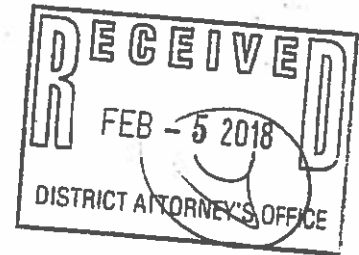
TOTAL AMOUNT DUE AT THIS TIME

\$11,151.30

Please Pay  
\$1,360.89

The RCL

Cosgrove , Eisenberg & Kiley, P.C.  
803 Hancock Street  
P.O. Box 189  
Quincy, MA 02170,  
(617) 479-7770



February 01, 2018

Timothy J. Cruz  
District Attorney  
District Attorney's Office  
166 Main Street  
Brockton, MA 02301

Joseph D. Early, Jr.  
District Attorney  
District Attorney's Office  
Courthouse, Room G301  
225 Main Street  
Worcester, MA 01608

Michael D. O'Keefe  
District Attorney  
District Attorney's Office  
3231 Main Street  
P.O. Box 455  
Barnstable, MA 01630

ATTN:

RE: Maura Healey, Attorney General vs.  
TIMOTHY J. CRUZ, PLYMOUTH COUNTY  
DISTRICT ATTORNEY; JOSEPH D. EARLY, JR.,  
WORCESTER COUNTY DISTRICT ATTORNEY &  
MICHAEL D. O'KEEFE, CAPE & ISLAND  
DISTRICT ATTORNEY

CONTROL: 55876

OUR FILE: 14721.gov14721

OUR TAX ID: 04-2599380

YOUR FILE NO:

---

For Professional Services Rendered

		<u>Hrs/Rate</u>	<u>Amount</u>
1/17/2018 MF	Drafting opposition memo on summary judgment.	4.50 330.00/hr	1,485.00
Total Time		4.50	\$1,485.00

Attorney Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Meredith Fierro	4.50	330.00	\$1,485.00



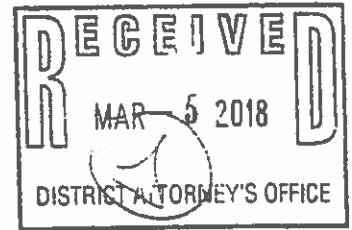
## Additional charges:

	<u>Amount</u>
12/31/2017 West Law Report	69.67
Total costs	<u>\$69.67</u>
TOTAL DUE THIS PERIOD	\$1,554.67
PREVIOUS BALANCE	\$11,857.26
PAYMENTS	
1/11/2018 Payment - thank you. Check No. Dirdep	(\$2,356.21)
1/19/2018 Payment from Cape and Islands	(\$1,360.89)
1/25/2018 Payment - thank you. Check No. DIR DEP Worcester	(\$1,360.89)
Total payments and adjustments	<u>(\$5,077.99)</u>
TOTAL AMOUNT DUE AT THIS TIME	<u>\$8,333.94</u>

Accounting - No  
 now work - However he should be  
 prior allocation tied up w/respect to  
 this

*[Signature]*

Cosgrove, Eisenberg & Kiley, P.C.  
803 Hancock Street  
P.O. Box 189  
Quincy, MA 02170,  
(617) 479-7770



March 01, 2018

CT# 0657

Timothy J. Cruz  
District Attorney  
District Attorney's Office  
166 Main Street  
Brockton, MA 02301

Joseph D. Early, Jr.  
District Attorney  
District Attorney's Office  
Courthouse, Room G301  
225 Main Street  
Worcester, MA 01608

Michael D. O'Keefe  
District Attorney  
District Attorney's Office  
3231 Main Street  
P.O. Box 455  
Barnstable, MA 01630

ATTN:

RE: Maura Healey, Attorney General vs.  
TIMOTHY J. CRUZ, PLYMOUTH COUNTY  
DISTRICT ATTORNEY; JOSEPH D. EARLY, JR.,  
WORCESTER COUNTY DISTRICT ATTORNEY &  
MICHAEL D. O'KEEFE, CAPE & ISLAND  
DISTRICT ATTORNEY

CONTROL: 55954

OUR FILE: 14721.govl4721

OUR TAX ID: 04-2599380

YOUR FILE NO:

---

For Professional Services Rendered

		<u>Hrs/Rate</u>	<u>Amount</u>
2/14/2018 MF	Reviewing statement of facts.	0.50 180.00/hr	90.00
2/20/2018 TRK	Telephone call's and correspondence.	0.25 330.00/hr	82.50
2/22/2018 MF	Renewing Summary Judgement Motion; brainstorming	2:00 180.00/hr	360.00

Total Time

2.75

\$532.50

97  
\$177.50  
Due

## Attorney Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Meredith Fierro	2.50	180.00	\$450.00
Thomas R. Kiley	0.25	330.00	\$82.50

Amount

PREVIOUS BALANCE

\$8,333.94

## PAYMENTS

2/6/2018 Payment - thank you. Check No. DIR DEP

(\$1,020.72)

Total payments and adjustments

(\$1,020.72)

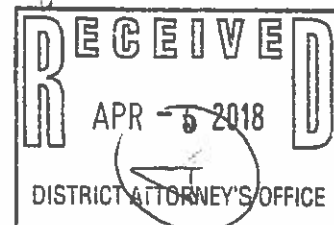
TOTAL AMOUNT DUE AT THIS TIME

\$7,845.72



trk

Cosgrove, Eisenberg & Kiley, P.C.  
803 Hancock Street  
P.O. Box 189  
Quincy, MA 02170,  
(617) 479-7770



April 03, 2018

Timothy J. Cruz  
District Attorney  
District Attorney's Office  
166 Main Street  
Brockton, MA 02301

Joseph D. Early, Jr.  
District Attorney  
District Attorney's Office  
Courthouse, Room G301  
225 Main Street  
Worcester, MA 01608

Michael D. O'Keefe  
District Attorney  
District Attorney's Office  
3231 Main Street  
P.O. Box 455  
Barnstable, MA 01630

ATTN:

RE: Maura Healey, Attorney General vs.  
TIMOTHY J. CRUZ, PLYMOUTH COUNTY  
DISTRICT ATTORNEY; JOSEPH D. EARLY, JR.,  
WORCESTER COUNTY DISTRICT ATTORNEY &  
MICHAEL D. O'KEEFE, CAPE & ISLAND  
DISTRICT ATTORNEY

CONTROL: 56174

OUR FILE: 14721.govl4721

OUR TAX ID:04-2599380

YOUR FILE NO:

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For Professional Services Rendered

		<u>Hrs/Rate</u>	<u>Amount</u>
3/23/2018 MF	Research for summary judgment opposition.	5.00 180.00/hr	900.00
3/24/2018 MF	Research and outlining summary judgment opposition.	8.17 180.00/hr	1,470.60
3/26/2018 MF	Brainstorming arguments; research on availability of records	8.75 180.00/hr	1,575.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	and Todd Wallack articles.		
3/27/2018 MF	Case law research and outlining/drafting summary judgment opposition.	9.75 180.00/hr	1,755.00
3/28/2018 MF	Writing opposition to summary judgment memo.	9.83 180.00/hr	1,769.40
TRK	TTD; telephone call's/AG.	0.60 330.00/hr	198.00
3/29/2018 MF	Drafting summary judgment opposition.	8.83 180.00/hr	1,589.40
3/30/2018 MF	Drafting summary judgment opposition.	7.50 180.00/hr	1,350.00
3/31/2018 TRK	Review summary judgment materials; TTD.	1.00 330.00/hr	330.00
Total Time		59.43	\$10,937.40


Attorney Summary

Name	Hours	Rate	Amount
Meredith Fierro	57.83	180.00	\$10,409.40
Thomas R. Kiley	1.60	330.00	\$528.00

TOTAL AMOUNT DUE AT THIS TIME

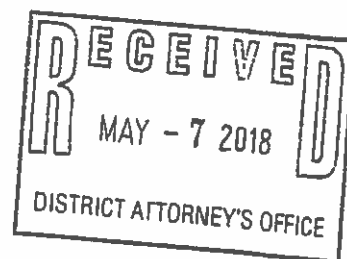
\$10,937.40

EACH OFFICE OWES \$3,645.80 FOR THIS PERIOD.


\$3645.80

trk

Cosgrove, Eisenberg & Kiley, P.C.  
803 Hancock Street  
P.O. Box 189  
Quincy, MA 02170,  
(617) 479-7770



May 01, 2018

Timothy J. Cruz  
District Attorney  
District Attorney's Office  
166 Main Street  
Brockton, MA 02301

Joseph D. Early, Jr.  
District Attorney  
District Attorney's Office  
Courthouse, Room G301  
225 Main Street  
Worcester, MA 01608

Michael D. O'Keefe  
District Attorney  
District Attorney's Office  
3231 Main Street  
P.O. Box 455  
Barnstable, MA 01630

ATTN:

RE: Maura Healey, Attorney General vs.  
TIMOTHY J. CRUZ, PLYMOUTH COUNTY  
DISTRICT ATTORNEY; JOSEPH D. EARLY, JR.,  
WORCESTER COUNTY DISTRICT ATTORNEY &  
MICHAEL D. O'KEEFE, CAPE & ISLAND  
DISTRICT ATTORNEY

CONTROL: 56247

OUR FILE: 14721.govl4721

OUR TAX ID: 04-2599380

YOUR FILE NO:

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For Professional Services Rendered

		<u>Hrs/Rate</u>	<u>Amount</u>
4/2/2018 TRK	Document review; markup and edit; TTD; correspondence.	4.00 330.00/hr	1,320.00
4/3/2018 MF	Working up new argument from TK and more facts on how CORI works.	7.00 180.00/hr	1,260.00
4/4/2018 MF	Revising draft with new argument and other edits.	10.00 180.00/hr	1,800.00

		<u>Hrs/Rate</u>	<u>Amount</u>
4/5/2018 MF	Revising summary judgment opposition draft.	7.00 180.00/hr	1,260.00
TRK	Work on summary judgment.	4.00 330.00/hr	1,320.00
4/6/2018 MF	Revising summary judgment opposition draft.	8.67 180.00/hr	1,560.60
TRK	Document review; TTD.	1.60 330.00/hr	528.00
4/9/2018 TRK	Edit memo draft.	1.40 330.00/hr	462.00
MF	Revising opposition motion.	9.00 180.00/hr	1,620.00
4/10/2018 TRK	Discussion with staff re: DAMION system; editing and record review.	4.33 330.00/hr	1,428.90
MF	Drafting "even if" argument for opposition motion.	4.42 180.00/hr	795.60
4/11/2018 TRK	Work on memo.	2.33 330.00/hr	768.90
MF	Rewriting facts section and adding "even if" argument.	9.67 180.00/hr	1,740.60
CV	Rev. MF draft of MSL opp; comments to MF.	1.25 330.00/hr	412.50
4/12/2018 MF	TK and Carl edits to Summary Judgment Memo.	7.50 180.00/hr	1,350.00

		<u>Hrs/Rate</u>	<u>Amount</u>
4/12/2018 TRK	Editing; telephone call's/AG; correspondence.	3.50 330.00/hr	1,155.00
4/13/2018 TRK	Mechanics; TTD.	1.00 330.00/hr	330.00
MF	Filing opposition.	0.50 180.00/hr	90.00
4/18/2018 MF	Writing insert to amend memo re: criminal justice bill.	0.25 180.00/hr	45.00
4/20/2018 MF	Filing motion/final review.	0.25 180.00/hr	45.00
4/24/2018 MF	Correspondence with AAG Rush on filing.	0.17 180.00/hr	30.60
Total Time		87.84	\$19,322.70

## Attorney Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Carl Valvo	1.25	330.00	\$412.50
Meredith Fierro	64.43	180.00	\$11,597.40
Thomas R. Kiley	22.16	330.00	\$7,312.80

## Additional charges:

3/31/2018 West Law Report	198.37
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Total costs	\$198.37
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TOTAL DUE THIS PERIOD	\$19,521.07
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## PAYMENTS

4/9/2018 Payment - Thank You	Dir Dep (Worc.)	(\$177.50)
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4/19/2018 Payment - thank you (Cape &  
Islands)

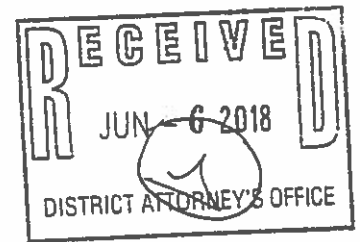
Amount  
(\$5,668.80)

Total payments and adjustments

(\$5,846.30)

Joe:  
Your share of this is  
\$6507.02  
The King

Cosgrove, Eisenberg & Kiley, P.C.  
803 Hancock Street  
P.O. Box 189  
Quincy, MA 02170,  
(617) 479-7770



June 01, 2018

*Handwritten:* 1515  
\$330.50

Timothy J. Cruz  
District Attorney  
District Attorney's Office  
166 Main Street  
Brockton, MA 02301

Joseph D. Early, Jr.  
District Attorney  
District Attorney's Office  
Courthouse, Room G301  
225 Main Street  
Worcester, MA 01608

Michael D. O'Keefe  
District Attorney  
District Attorney's Office  
3231 Main Street  
P.O. Box 455  
Barnstable, MA 01630

ATTN:

RE: Maura Healey, Attorney General vs.  
TIMOTHY J. CRUZ, PLYMOUTH COUNTY  
DISTRICT ATTORNEY; JOSEPH D. EARLY, JR.,  
WORCESTER COUNTY DISTRICT ATTORNEY &  
MICHAEL D. O'KEEFE, CAPE & ISLAND  
DISTRICT ATTORNEY

CONTROL: 56341

OUR FILE: 14721.govl4721  
OUR TAX ID:04-2599380  
YOUR FILE NO:

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For Professional Services Rendered

		<u>Hrs/Rate</u>	<u>Amount</u>
5/7/2018 TRK	Document review; TTD	0.50	165.00
	re: Summary Judgment.	330.00/hr	
5/8/2018 TRK	Telephone call's and	0.50	165.00
	TTD.	330.00/hr	
Total Time		1.00	\$330.00

Name	Attorney Summary	Hours	Rate	Amount
Thomas R. Kiley		1.00	330.00	\$330.00

## Additional charges:

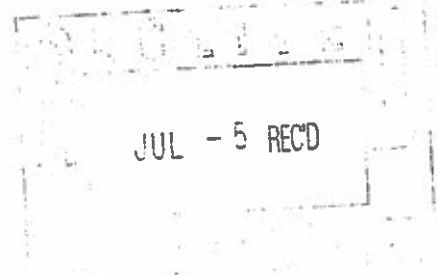
	<u>Amount</u>
4/30/2018 West Law Report	61.68
West Law Report	587.81
Total costs	<u>\$649.49</u>
TOTAL DUE THIS PERIOD	<u>\$979.49</u>
PREVIOUS BALANCE	\$29,106.40
PAYMENTS	
5/8/2018 Payment - thank you. Check No. Dir Dep	(\$3,645.80)
5/21/2018 Cape and Islands District Attorney	(\$3,645.80)
Total payments and adjustments	<u>(\$7,291.60)</u>
TOTAL AMOUNT DUE AT THIS TIME	<u>\$22,794.29</u>

EACH OFFICE OWES \$326.50 FOR THIS INVOICE

Argument on motion for  
summary judgment is on  
for 6/13.  
TRK

trk

Cosgrove, Eisenberg & Kiley, P.C.  
803 Hancock Street  
P.O. Box 189  
Quincy, MA 02170,  
(617) 479-7770



July 02, 2018

Timothy J. Cruz  
District Attorney  
District Attorney's Office  
166 Main Street  
Brockton, MA 02301

Joseph D. Early, Jr.  
District Attorney  
District Attorney's Office  
Courthouse, Room G301  
225 Main Street  
Worcester, MA 01608

Michael D. O'Keefe  
District Attorney  
District Attorney's Office  
3231 Main Street  
P.O. Box 455  
Barnstable, MA 01630

ATTN:

RE: Maura Healey, Attorney General vs.  
TIMOTHY J. CRUZ, PLYMOUTH COUNTY  
DISTRICT ATTORNEY; JOSEPH D. EARLY, JR.,  
WORCESTER COUNTY DISTRICT ATTORNEY &  
MICHAEL D. O'KEEFE, CAPE & ISLAND  
DISTRICT ATTORNEY

CONTROL: 56538

OUR FILE: 14721.gov14721

OUR TAX ID: 04-2599380

YOUR FILE NO:

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For Professional Services Rendered

		<u>Hrs/Rate</u>	<u>Amount</u>
6/7/2018 TRK	Organize for argument.	0.40 330.00/hr	132.00
6/9/2018 TRK	File review.	1.25 330.00/hr	412.50
6/12/2018 TRK	Prep. for summary judgment argument; telephone call/AGO.	5.00 330.00/hr	1,650.00
6/13/2018 MF	Prep for and attend hearing; writing up memo on judge's question.	3.00 180.00/hr	540.00

		<u>Hrs/Rate</u>	<u>Amount</u>
6/13/2018 TRK	Prep; argument; follow up.	8.00 330.00/hr	2,640.00

Total Time	17.65	<u>\$5,374.50</u>
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## Attorney Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Meredith Fierro	3.00	180.00	\$540.00
Thomas R. Kiley	14.65	330.00	\$4,834.50


PREVIOUS BALANCE	\$22,794.29
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## PAYMENTS

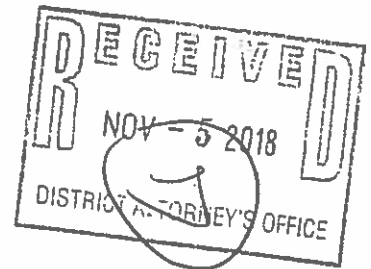
6/6/2018 Payment - thank you. Check No. DIR DEP	(\$6,507.02)
6/6/2018 Payment - thank you. Check No. Dir Dep	(\$3,645.80)
6/13/2018 Payment - thank you. Check No. Dir Dep	(\$6,507.02)
6/20/2018 Payment - thank you. Check No. Dir Dep.	(\$6,507.02)
Check No. Dir Dep	

Total payments and adjustments	<u>(\$23,166.86)</u>
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TOTAL AMOUNT DUE AT THIS TIME	<u><u>\$5,001.93</u></u>
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Gattener:  
 Your respective shares of the  
 current bill are \$1667.31 apiece.  


Cosgrove, Eisenberg & Kiley, P.C.  
803 Hancock Street  
P.O. Box 189  
Quincy, MA 02170,  
(617) 479-7770



November 01, 2018

\$ 188.70

Timothy J. Cruz  
District Attorney  
District Attorney's Office  
166 Main Street  
Brockton, MA 02301

Joseph D. Early, Jr.  
District Attorney  
District Attorney's Office  
Courthouse, Room G301  
225 Main Street  
Worcester, MA 01608

Michael D. O'Keefe  
District Attorney  
District Attorney's Office  
3231 Main Street  
P.O. Box 455  
Barnstable, MA 01630

ATTN:

RE: Maura Healey, Attorney General vs.  
TIMOTHY J. CRUZ, PLYMOUTH COUNTY  
DISTRICT ATTORNEY; JOSEPH D. EARLY, JR.,  
WORCESTER COUNTY DISTRICT ATTORNEY &  
MICHAEL D. O'KEEFE, CAPE & ISLAND  
DISTRICT ATTORNEY

CONTROL: 57036

OUR FILE: 14721.govl4721

OUR TAX ID: 04-2599380

YOUR FILE NO:

---

For Professional Services Rendered

		<u>Hrs/Rate</u>	<u>Amount</u>
10/22/2018 TRK	Review DPHSJC brief; telephone call's and TTD.	1.17 330.00/hr	386.10
MF	Reviewing new Globe case on public records pending before SJC.	1.00 180.00/hr	180.00
Total Time		2.17	\$566.10

Attorney Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Meredith Fierro	1.00	180.00	\$180.00

Name	Hours	Rate	Amount
Thomas R. Kiley	1.17	330.00	\$386.10

TOTAL AMOUNT DUE AT THIS TIME

\$566.10

Each office aux \$100.70  
TK

*TK*